

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	George T. Green	:	Chapter 13
	Debtor(s).	:	
		:	Case No: 15-03811 RNO
		:	
	Toyota Motor Credit Corporation	:	
	Movant,	:	
		:	
	v.	:	
		:	
	George T. Green	:	
	Respondent.	:	
	and	:	
		:	
	Linda Anne Green	:	
	Charles J. DeHart, III, Esquire	:	11 U.S.C. Sections 362 and 1301
	Additional Respondents	:	

ANSWER TO MOTION FOR FROM THE AUTOMATIC STAY

AND NOW, comes the Debtor, George T. Green, by and through his counsel, Michael R. Caum, Esquire, and files the within Answer stating that:

1. Admitted.
2. Denied. Paragraph 2 constitutes a legal conclusion to which no response is required under the Federal Rules of Civil Procedure and accordingly such averment is denied.
3. Admitted.
4. The vehicle title is a document that speaks for itself.
5. Denied. Paragraph 5 constitutes a legal conclusion to which no response is required under the Federal Rules of Civil Procedure and accordingly such averment is denied.

6. Denied. Debtor has made all post-payments on the vehicle. Strict proof is demanded at trial.

7. Denied. Debtor incorporates his response to Paragraph 6 by reference and for the reasons contained therein deny any amounts are due Movant.

8. Denied. Debtor incorporates his response to Paragraph 7 by reference and for the reasons contained therein deny any amounts are due Movant. The remainder of Paragraph 8 constitutes a legal conclusion to which no response is required under the Federal Rules of Civil Procedure and accordingly such averment is denied.

(a) Denied. Debtor incorporates his response to Paragraph 7 by reference and for the reasons contained therein deny any amounts are due Movant. The remainder of Paragraph 8(a) constitutes a legal conclusion to which no response is required under the Federal Rules of Civil Procedure and accordingly such averment is denied.

(b) Denied. The vehicle is in good condition.

9. Paragraph 9 constitutes a legal conclusion to which no response is required under the Federal Rules of Civil Procedure and accordingly such averment is denied.

WHEREFORE, the Respondent, George T. Green, requests this Honorable Court to:

- (a) Deny all relief requested in Movant's Motion;
- (b) Award any and all relief this Honorable Court deems just.

Respectfully Submitted,

Date: 11/14/17

/s/ Michael R. Caum
Michael R. Caum, Esquire
Attorney I.D. No. 87397
P.O. Box 272
Shrewsbury, PA 17361
(717) 227-8039
Attorney for Debtor

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CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2017, I electronically filed the foregoing with the Clerk of the Bankruptcy Court using CM/EFC system, which sent notification of such filing to the following Filing Users:

Office of the United States Trustee

Charles DeHart, III, Chapter 13 Trustee

James Warmbrodt, Esquire
bkgroup@kmlawgroup.com

Dated: 11/14/17

/s/ Michael R. Caum
Michael R. Caum, Esquire
PO Box 272
Shrewsbury, PA 17361
(717) 227-8039
Attorney for Debtor